

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
No. 7:23-CV-897

IN RE:	)	<b>PLAINTIFF LEADERSHIP</b>
CAMP LEJEUNE WATER LITIGATION	)	<b>GROUP’S MOTION TO STRIKE</b>
	)	<b>DR. JULIE GOODMAN’S</b>
This Pleading Relates to:	)	<b>UNTIMELY AND IMPROPER</b>
	)	<b>SUPPLEMENTAL EXPERT</b>
ALL CASES.	)	<b>REPORTS</b>
	)	

Pursuant to Federal Rules of Civil Procedure 16 and 26(e), Plaintiff Leadership Group moves to strike Dr. Julie Goodman’s supplemental materials, which she attached to Defendant’s opposition to Plaintiffs’ motion to exclude her initial reports. (D.E. 686-2)-(D.E. 686-11). Rule 26(e) requires a party to supplement when it “learns that in some material respect the disclosure or response is incomplete or incorrect.” *Pierce v. N.C. State Bd. of Elections*, No. 4:23-cv-193, 2024 WL 5170738, at \*3 (E.D.N.C. Dec. 18, 2024) (J. Dever); *see also* Fed. R. Civ. Proc. 26(e)(1)(A). Supplementation is not a basis to provide new expert opinions, but is rather for correcting inadvertent errors or omissions. *Gallagher v. S. Source Packaging, LLC*, 568 F. Supp. 2d 624, 631 (E.D.N.C. 2008) (J. Dever) (“Courts distinguish ‘true supplementation’ (e.g., correcting inadvertent errors or omissions) from gamesmanship.”). Moreover, such supplementation must be made “in a timely manner.” Fed. R. Civ. Proc. 26(e)(1)(A).

As detailed in the attached Memorandum, Dr. Goodman’s supplemental materials are not proper supplementation under Rule 26(e) both because she provides new conclusions and analysis therein, and because they are untimely. Pursuant to Rule 16, the new materials should be stricken.

Dated: November 18, 2025.

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